

TIMOTHY P. JOHNSON (BAR No. 66333)
LAW OFFICES OF TIMOTHY P. JOHNSON
1970 OLD TUSTIN AVENUE, SECOND FLOOR
SANTA ANA, CALIFORNIA 92705
TELEPHONE: (714) 832-1170
FACSIMILE: (714) 832-1179
E-MAIL: tjohnson@johnson-chambers.com

Manuel H. Newburger, pro hac vice
BARRON & NEWBURGER, PC
1212 Guadalupe, Suite 104
Austin, TX 78701
Telephone: (512) 476-9103
E-Mail: mnewburger@bn-lawyers.com

Attorneys for Defendant CACH, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JESUS MARTINEZ, an individual,
on behalf of himself and all others
similarly situated,

Plaintiffs,

vs.

CACH, LLC, a Colorado Limited
Liability Company; SQUARETWO
FINANCIAL COMMERCIAL
FUNDING CORPORATION, a
Delaware Corporation, and DOES 2
through 25

Defendant.

Case No. 10 CV 01625 DMS MDD

**JOINT MOTION TO DISMISS
ACTION**

IT BEING HEREBY STIPULATED by and between the parties to this action through their counsel of record that the above-captioned action be dismissed with prejudice pursuant to FRCP 41(a)(1) as a result of the settlement of this case, the parties jointly move this court to dismiss this action and all claims asserted therein with prejudice.

Dated: May 18, 2012

NICHOLAS & BUTLER, LLP

By: /s/ Matthew B. Butler
Matthew B. Butler
Attorneys for Plaintiff JESUS MARTINEZ

Dated: May 18, 2012

RECORDON & RECORDON

By: /s/ Stephen G. Recordon
Stephen G. Recordon
Attorneys for Plaintiff JESUS MARTINEZ

Dated: May 18, 2012

ROONEY & LICKEL

By: /s/ Clinton Rooney
Clinton Rooney
Attorneys for Plaintiff JESUS MARTINEZ

Dated: May 18, 2012

**HAYES SCOTT BONINO ELLINGSON &
McLAY, LLP**

By: /s/ Stephen A. Scott
Stephen A. Scott
Attorneys for Defendant SQUARETWO
FINANCIAL COMMERCIAL FUNDING
CORPORATION

Dated: May 18, 2012

LAW OFFICES OF TIMOTHY P. JOHNSON

By: /s/Timothy Johnson
Attorneys for Defendant CACH, LLC

LAW OFFICES OF TIMOTHY P. JOHNSON

Martinez v. CACH, LLC

USDC Case No. 10 CV 01625 DMS MDD

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 1970 Old Tustin Avenue, Second Floor, Santa Ana, California 92705.

On May 22, 2012, I served a true copy of **JOINT MOTION TO DISMISS ACTION** on all interested parties in this action by:

☐ By personally delivering it to the person(s) indicated below in the manner as provided in FRCP 5(B);

☐ By depositing it in the United States mail in a sealed envelope with the postage thereon fully prepaid to the following:

☐ By overnight delivery using an envelope or package provided by the overnight service carrier and addressed to the following:

☒ By ECF: On this date, I electronically filed the document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to the following:

Stephen G. Recordon, Esq.
RECORDON & RECORDON
225 Broadway, Suite 1900
San Diego, CA 92101

Clinton Rooney, Esq.
ROONEY & LICKEL
1102 Cesar E. Chavez Parkway
San Diego, CA 92113

Mathew B. Butler, Esq.
NICHOLAS & BUTLER, LLP
225 Broadway, 19th Floor
San Diego, CA 92101

Stephen A. Scott, Esq.
HAYES SCOTT BONINO ELLINGSON & McLAY, LLP
203 Redwood Shores Parkway, Suite 480
Redwood City, CA 94065

I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

EXECUTED on May 22, 2012, at Santa Ana, California.

/s/Timothy Johnson

TIMOTHY P. JOHNSON
Attorneys for Defendant CACH, LLC